

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,                     )  
                    Plaintiff,                     )  
                    v.                                 )     No. 05-38  
TYRONE WILLIAMS,                             )  
                    Defendant.                     )

**MOTION FOR DETENTION HEARING**

**NOW COMES** the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. §3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because case involves (**check all that apply**):

  X         Crime of violence (18 U.S.C. § 3156)  
            Maximum sentence life imprisonment or death  
            10+ year drug offense  
            Felony, with two prior convictions in above categories  
  X         Serious risk defendant will flee  
            Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (**check one or both**):

  X         Defendant's appearance as required  
  X         Safety of any other person and the community

3. **Rebuttable Presumption.** The United States (will, will not) invoke the rebuttable presumption against defendant under §3142(e). (If yes) The presumption applies because (check one or both):

\_\_\_\_\_ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

\_\_\_\_\_ Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

\_\_\_\_\_ At first appearance

  X   After continuance of   3   days (not more than 3).

DATED this   29th   day of April, 2005.

COLM F. CONNOLLY  
United States Attorney

BY: /s/  
Richard G. Andrews  
First Assistant U. S. Attorney